July 27, 2000

SENT VIA E-MAIL AND U.S. MAIL

Donald C. Davis
Peggy Rubino
George S. Ford
Z-Tel Communications, Inc.
601 South Harbor Island Boulevard
Suite 220
Tampa, FL 33602
- and Michael B. Hazzard, Esq.
Kelley Drye & Warren, LLP
1200 19th Street, N.W.,
Suite 500
Washington, D.C. 20036

Re: D.T.E. 99-271

Dear Ms. Rubino and Messrs. Davis and Hazzard:

Enclosed please find questions to Z-Tel Communications Inc. ("Z-Tel") issued by the Department based upon Z-Tel's July 18, 2000, filing in D.T.E. 99-271. Please submit Z-Tel's responses to the Department and the participants in hard copy and by e-mail on or before **5:00 p.m. Thursday, August 3, 2000**. Should you have any questions please contact either Cathy Carpino at (617)305-3622 or Tina Chin at (617)305-3578.

Sincerely,

Cathy Carpino Tina Chin Hearing Officer Hearing Officer

Enc.

cc: DTE 99-271 Service List (w/enc.)

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

QUESTIONS TO Z-TEL COMMUNICATIONS INC. D.T.E. 99-271

The Department of Telecommunications and Energy ("Department") submits to Z-Tel Communications Inc. ("Z-Tel") the following Questions.

Instructions

The following instructions apply to this set of Questions and all subsequent Questions issued by the Department to Z-Tel in this proceeding.

- 1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3. These requests shall be deemed continuing so as to require further supplemental responses if Z-Tel or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4. The term "provide complete and detailed documentation" means:
 - Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
- 5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
- 6. If Z-Tel finds that any one of these questions is ambiguous, please notify the hearing officers so that the question may be clarified prior to the preparation of a written

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response.

7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; two (2) copies for each hearing officer; and one (1) copy to each member of the participants' service list, including the Department's telecom analysts.

COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

DEPARTMENT QUESTIONS TO Z-TEL COMMUNICATIONS INC. D.T.E. 99-271

- 1. [Checklist item # 2] <u>See</u> Rubino Comments at ¶9: Please provide a list of all GUI outages experienced by Z-Tel since May 1, 2000, and, to the extent possible, provide any documentation showing Z-Tel's efforts to obtain information on such outages and their causes from BA's help desk.
- 2. [Checklist item # 2] <u>See</u> Rubino Comments at ¶¶10-12: Has Z-Tel documented its discussions with BA-MA regarding problems with the SMARTs Clock due dates and the rejection of orders that used the "cut-through" feature of LiveWire? If so, please provide any documentation related to these problems and the proposed work-arounds and resolutions?